

**FACEBOOK EXHIBIT U**

**REDACTED VERSION OF DOCUMENT  
SOUGHT TO BE FILED UNDER SEAL**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC. CONSUMER ) MDL No. 2843  
PRIVACY USER PROFILE LITIGATION) Case No.  
\_\_\_\_\_ ) 18-md-02843-VC

This document relates to: )  
ALL ACTIONS )  
\_\_\_\_\_ )

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REMOTE VIDEOTAPED DEPOSITION BY VIRTUAL ZOOM OF  
FACEBOOK INC. REPRESENTATIVE,  
KONSTANTINOS PAPAMILTIDIS  
TUESDAY, FEBRUARY 23, 2021

Reported by:  
Ashala Tylor, CSR #2436, CLR, CRR, RPR  
JOB NO. 4473154  
PAGES 1 - 280

1	BY MS. WEAVER:	10:32
2	Q. Okay. Who has it? You just gave that as	10:32
3	an example.	10:32
4	A. Yeah, but that is a logic that takes place	10:32
5	on the advertiser's side.	10:32
6	Q. Okay.	10:32
7	A. The advertiser selects the marketing team	10:32
8	on the advertiser side to decide what kind of	10:32
9	campaign they want to run. And they create a	10:33
10	segment of their customers that they want to target	10:33
11	with their ad campaign, and then they will decide	10:33
12	what creative they want to use, like how the ad is	10:33
13	going to look like.	10:33
14	Q. Right. But this is a list of information	10:33
15	that Facebook receives, right?	10:33
16	MS. STEIN: Objection to form.	10:33
17	THE WITNESS: The information we receive	10:33
18	is not the activities. It's hashed email addresses	10:33
19	or hashed phone numbers from the advertisers.	10:33
20	BY MS. WEAVER:	10:33
21	Q. Okay. Looking at this chart here, it's	10:33
22	labeled, "What kinds of information does Facebook	10:33
23	receive?" correct?	10:33
24	MS. STEIN: Objection to form.	10:33
25	(Background audio interference.)	10:33

1	<span style="background-color: black; color: black;">[REDACTED]</span>	10:34
2	MS. STEIN: Objection to form. The	10:35
3	document speaks for itself.	10:35
4	MS. WEAVER: I'm here to depose him about	10:35
5	the document, Deb. It was identified ahead of time.	10:35
6	Please answer the question.	10:35
7	MS. STEIN: Yeah, Lesley, this document is	10:35
8	all about targeted advertising, and you've been	10:35
9	going on for about an hour about targeted	10:35
10	advertising which isn't even in this case. It's	10:35
11	outside the scope of this case.	10:35
12	MS. WEAVER: You can instruct him not to	10:35
13	answer if you want, but I'm actually --	10:35
14	MS. STEIN: Lesley, I've let this witness	10:35
15	testify for an hour about targeted advertising. So	10:35
16	if you want to ask him about the scope of this	10:35
17	deposition, you're free to, but suggesting that just	10:35
18	because you sent us a document about targeted	10:35
19	advertising --	10:35
20	MS. WEAVER: Deb, stop lecturing and	10:35
21	wasting my minutes with the witness, please.	10:35
22	MS. STEIN: Lesley, I am stating my	10:35
23	position for the record. This is a 30(b)(6)	10:35
24	deposition on a specific set of topics. You've gone	10:35
25	beyond the scope. I've been very liberal in that.	10:35

1 Q. What does that refer to? 10:37

2 A. So this is the version of the SDK that is 10:37

3 used by websites. 10:37

4 Q. Okay. And did that change over time? 10:37

5 A. Yes, we update the SDKs quite regularly. 10:38

6 Q. Okay. And "Mobile SDK," what is that? 10:38

7 A. This is the SDK that is used by native 10:38

8 apps, meaning iOS and Android. 10:38

9 Q. Okay. I just want to go back to 10:38

10 [REDACTED] 10:38

11 [REDACTED] 10:38

12 A. I think we discussed about that before. 10:38

13 So I'll try to repeat my previous response. 10:38

14 [REDACTED] 10:38

15 [REDACTED] 10:38

16 [REDACTED] 10:38

17 Q. Okay. I see that I guess the videographer 10:38

18 would like to take a quick break. So do you want to 10:38

19 just -- is that comfortable for you, K.P., to take a 10:38

20 break for a little bit here? 10:38

21 A. Yes, I need a coffee. 10:38

22 MS. WEAVER: Okay. So why don't we come 10:38

23 back at, do you want to say, 10:50? 10:38

24 THE WITNESS: 10 minutes from now? 10:38

25 MS. WEAVER: Yeah, does that work? Well, 10:39